## CENTENNIAL COMMUNICATIONS

3349 Route 148, Building A Wall, New Jersey 07719 732-556-2200

November 19, 2007

Marlene Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re: Centennial Communications Corp.

Hearing Aid Compatibility Compliance Report – WT Docket 01-309

Dear Ms. Dortch:

Pursuant to the Commission's Hearing Aid Compatibility Report and Order in WT Docket No. 01-309, <sup>1</sup> and the subsequent Public Notice in the same proceeding, <sup>2</sup> Centennial Communications Corp. ("Centennial") hereby submits the following report detailing its compliance with the Commission's hearing aid compatibility requirements for digital wireless handsets. In this report, Centennial includes all information of which it has knowledge, but does not address those reporting requirements in the Order that can only be answered adequately by the individual handset manufacturers from which Centennial obtains digital wireless handsets.

Centennial provides CMRS service both in and outside of the continental United States, and operates different network designs within the two regions. Centennial Puerto Rico License Corp. holds the B block broadband PCS license for MTA 25 – Puerto Rico/US Virgin Islands and we operate a CDMA network in that region. Through five different subsidiaries,<sup>3</sup> Centennial also holds licenses to provide digital cellular and PCS service in 39 markets in the Midwest and Southern United States, and we utilize a GSM network in our domestic markets. The responses below are the same for both regions, unless noted.

In the Matter of Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones, *Report and Order*, WT Docket No. 01-309, 18 FCC Rcd 16753, released August 14, 2003.

Public Notice, Wireless Telecommunications Bureau Announces Hearing Aid Compatibility Reporting Dates for Wireless Carriers and Handset Manufacturers, DA 04-630, 19 FCC Rcd 4097 (WTB 2004).

These five subsidiaries are: Bauce Communications of Beaumont, Inc., Centennial Michiana License Company, LLC, Centennial Southeast License Company, LLC, Elkhart Metronet, Inc. and Lafayette Cellular Telephone Company.

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- (1) <u>Digital wireless phones tested</u>: Centennial operates both CDMA and GSM systems and obtains digital wireless telephone handsets manufactured by several handset vendors (collectively, "vendors"). Centennial carries several CDMA and GSM handsets that are compliant with the ANSI C63.19 standard ("HAC Compliant Phones"). However, Centennial does not conduct the laboratory testing of handset devices for compliance with the ANSI C63.19 standard. It relies upon its vendors to conduct testing and to confirm the compliance of each specific digital handset device.
- (2) <u>Laboratory used</u>: As indicated herein, Centennial does not conduct the laboratory testing of its digital handset devices for compliance with the ANSI C63.19 standard. It relies upon its vendors to conduct testing and to confirm the compliance of each specific digital handset device.
- (3) <u>Test results for each phone tested</u>: According to its vendors, the HAC Compliant Phones deployed by Centennial have tested positively for M3, M4, T3 and T4 compliance.
- (4) <u>Identification of compliant phone models and ratings according to ANSI C63.19</u>: According to our vendors, the HAC Compliant Phones currently offered (or soon to be added) by Centennial are as follows:

## In our Caribbean market:

Handset	HAC	Status
	Compliance	
	Rating	
Motorola Krzr K1	M3, T3	In stores
Motorola Rzr V3m	M4, T4	In stores
Motorola W385	M4, T4	In stores
Nokia 2865i	M3	In stores
1		
Motorola V9m	M4, T4	In stores on November 23, 2007

## In our domestic markets:

Handset	HAC Compliance Rating	Status
Nokia 6085	M3, T3	In stores
Nokia 6126	M3, T3	In stores
LG 2000	M3, T3	In stores
Sony Ericsson W580	M3, T3	In stores
Motorola Rzr V3	M3	In stores
Nokia 6061	M3	In stores
Motorola Rzr2 V8	M3, T3	In stores by end of month
BlackBerry 8310 - Curve	M3, T3	In stores by end of month

- (5) <u>Status of product labeling</u>: Centennial relies upon the manufacturers to label all products prior to their shipment to our retail locations. The HAC Compliant Phones that Centennial offers contain M3 and T3 product labeling.
- (6) <u>Outreach efforts</u>: Our vendors have worked to ensure that the phone packages are labeled correctly. Written materials, pamphlets and other promotional literature are provided at the point of sale, explaining the HAC features of compliant handsets. We also train our sales force to be aware of which of its handsets sold are HAC-compliant, and list this information on an internal website available to our sales staff. Centennial also has begun posting HAC Compliant Phone information on its website, calling attention to the HAC ratings of certain handsets.
- (7) <u>Retail availability of compliant phones</u>: HAC-compliant handsets are available in all of Centennial's retail outlets.
- (8) <u>Incorporation of hearing aid compatibility features into newer models of digital</u> <u>wireless phones</u>: Centennial relies upon handset manufacturers to incorporate HAC features into future CDMA and GSM handsets.
- 9) Activities related to ANSI C63.19 or other standards work intended to promote compliance with the FCC Order: Centennial is ready and willing to offer additional compliant devices to interested customers, and encourages its vendors to expedite the availability of advanced handset devices.

## (10) Number of compliant and non-compliant phone models offered at this time:

Centennial offers a variety of handsets. As described above, in our Puerto Rican market, we offer numerous CDMA handsets, of which four are HAC compliant. A fifth HAC Compliant Phone will be offered by the end of this week. In our domestic markets, we also offer numerous GSM handsets, of which six are HAC compliant, with two more HAC Compliant Phones to be added by the end of this month.

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- (11) <u>Differences in handset offerings among regions in service areas, if any</u>: As explained in response to Item 4 above, Centennial operates different networks and consequently offers different handsets in its domestic versus Caribbean markets.
- (12) Ongoing efforts for interoperability testing with hearing aid devices: Centennial primarily relies upon its vendors to conduct interoperability testing of compliant handsets, and will provide to consumers information about those efforts upon request.

Sincerely,	

/s/ William L. Roughton, Jr.

William L. Roughton, Jr. Vice President, Legal and Regulatory Affairs Centennial Communications Corp.